

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**DEFENDANT MAYTAG CORPORATION'S MOTION FOR ENTRY
OF A TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION REGARDING IMPROPER ASSET TRANSFERS**

NOW COMES Maytag Corporation (“Maytag”), through its undersigned counsel, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and respectfully moves this Court for a temporary restraining order and preliminary injunction prohibiting Plaintiffs/Counter-Defendants Dyson Technology Limited and Dyson, Inc., its parent company, James Dyson Limited, and any of its subsidiaries and affiliates (“Dyson”) from transferring, outside the normal course of business unless by Court order, any liquid cash funds that would result in Dyson having less than \$300 million or the equivalent in liquid cash funds in its corporate holdings. Maytag requests that this Order prohibit such transfers that include, but are not limited to, transfers in the form of dividends, salaries, bonuses, distributions, or any other such transactions.

In support thereof, Maytag files the accompanying memorandum in support of its motion and the Affidavit of Josh Goldberg.

A Certificate pursuant to L.R. 7.1.1 is attached hereto as Exhibit A.

A form or ORDER is attached hereto As Exhibit B.

Dated: December 1, 2006

Respectfully submitted,

MAYTAG CORPORATION

/s/ Francis DiGiovanni

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CERTIFICATE OF SERVICE

I, Francis DiGiovanni, hereby certify that on December 1, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on December 1, 2006, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record, and by e-mail and first class mail on the following counsel of record:

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